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February 24, 2023

**Via ECF**

Hon. Lee G. Dunst, U.S.M.J.  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Agudelo v. Recovco Mortgage Management LLC et al.*, No. 22 Civ. 4004  
Update to the Court

Dear Judge Dunst:

The parties write pursuant Your Honor's February 16, 2023, direction to provide an update to the Court by today's date.

The parties made progress since our last update and would like to continue negotiating. The parties are working through a number of issues in trying to achieve a global resolution of claims. Defendants expect to make a counteroffer today or Monday. The parties would like to update the Court on or before March 6, 2023.

Respectfully submitted,

*/s/ Scott Simpson*  
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cc: All counsel (by ECF)